

**To:** Suchomel, Bruce[Suchomel.Bruce@epa.gov]  
**From:** Mike Hackney  
**Sent:** Thur 2/9/2017 6:20:02 PM  
**Subject:** RE: Maj Mod Draft; Antelope Creek

Bruce,

Looking though this, I see an issue with the legal description because the final description does include lands from prior major modifications to the permit.

In the 1996-1998 timeframe there was a modification to the permit that brought in TS4S R3W USM sections 33&34 (and I believe 32 although we have no injectors in that section).

The language of this mod should read something like Original Permit Area (July 14, 1994, as amended 199X). Showing all the acreage under the previous mod(s).

We have very incomplete records of the modifications to this permit and with over 20 years having passed, I was not aware of there having been 7 previous major modifications. I was aware of two. I know we did one mod to clean up the confining zone language and another to add sections 33 & 34, but I have no idea what the other five would have been for.

There may have been additional lands added that I am was aware of (including section 36, the subject of the current mod)

Could you quickly review those other mods to see if any other lands have been added previously (including section 36).

And if you sent this to me earlier and I missed it, I apologize for not catching it then.

Mike

208-685-7630

**From:** Cline, Carolyn [mailto:Cline.Carolyn@epa.gov]  
**Sent:** Thursday, February 09, 2017 8:39 AM  
**To:** Mike Hackney <mhackney@pgei.com>  
**Cc:** shaunc@utetribes.com; edreds@utetribes.com; reannint@utetribes.com;  
Bartholomew.stevens@bia.gov; BartP@utetribes.com; bpargeets@utetribes.com;  
bradhill@utah.gov; utvnmail@blm.gov  
**Subject:** FW: Maj Mod Draft; Antelope Creek

UT20736-00000; area permit expansion

**Sent:** Thursday, February 09, 2017 8:28 AM  
**Subject:** FW: petroglyph

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